Abstracts - Third-Party Data Meeting
George Mason University
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The Role of FSIS' Data Analysis and Integration Group
Valid and high quality data are the underpinning of sound science, and sound science is essential to inform agency actions aimed at protecting the food supply and achieving FSIS' public health mission. To further its goal of using high quality data and appropriate and rigorous data analyses, FSIS has recently formed two new entities—the Data Analysis and Integration Group (DAIG) and the Data Coordination Committee (DCC). The DAIG, which will initially be located within the Office of Food Defense and Emergency Response (OFDER), will be comprised of a staff of senior scientists and analysts. The DAIG will ensure that data used by FSIS for decision making are of high quality and consistent with relevant guidelines, and that FSIS data analyses are relevant to program offices' business processes and the agency mission. The DAIG will also provide assistance in data analysis to program offices, and provide a new level of sophistication in data analysis in FSIS, including sensitivity analyses to assist the agency in identifying key data needs. The DCC will be comprised of representatives from each program office, and will work with the DAIG to coordinate data analyses across the agency. In addition to working with the DCC, the DAIG will work closely with the Office of Policy, Program and Employee Development (OPPED) and the Office of the Chief Information Officer (OCIO). As a regulatory government agency, FSIS' actions need to be transparent, consistent appropriate, and data-driven. The DAIG and the DCC will strengthen the agency's focus on data and, consequently, will strengthen the foundations of agency decisions.

Guidelines for Protecting and Using Data from Industry and Other Third Parties
FSIS recognizes that sound data is essential to support the agency's actions aimed at protecting the food supply and achieving its public health mission.
Towards that recognition, FSIS has identified the need to enhance data analysis and integration to inform decision making and to anticipate food borne hazards.

The use of data from industry, academia, States, consumers, and foreign countries could fill important data gaps and provide the agency with the best available data to inform decision making by adding robustness, quality and validity.

FSIS currently utilizes federal and USDA information quality guidelines that apply to creation, collection, maintenance, dissemination and protection of data. The following criteria are integral for protecting and using data:
- Objectivity
  - Ensures data is substantive, accurate, reliable, complete and unbiased.
  - The source of the information will be identified to allow the public to assess if the data is objective.

- Utility
  - o Usefulness of the data
  - o Clearness of data
  - o Accessible to persons as per Section 508 of the Rehabilitation Act (hearing and sight special needs)
- Integrity
  - o Prevention of corruption or falsification by protecting information from unauthorized access or revision
  - o Security of information as per Federal Information System Managers Act (FISMA; addresses confidentiality, integrity and availability)[1]
  - o Protection and confidentiality of information as per The Privacy Act of 1974, as amended; The Paperwork Reduction Act of 1995; the Computer Security Act of 1987; the Freedom of Information Act; and OMB Circulars A-123[2], A-127[3], and A-130[4]

In November 2003, The National Advisory Committee on Meat and Poultry Inspection (NACMPI) recommended that FSIS provide information on how it would like to receive data that is voluntary from reliable sources. Emerging from the group's discussion were issues associated with aggregate data such as the submission, quality, validity, intent and protection. NACMPI also suggested that ground rules should be established for submission, acceptance and use of voluntarily submitted data through a third-party data repository and using a third party to review the data.

Another innovative option would be to form a taskforce comprised of industry, and agency representatives to set criteria for submitting, reviewing, accepting and protecting data submitted to a third-party repository from sources such as industry, government and academia. The taskforce would be organized to gain consent from the owners of the data and share information.

FSIS is currently examining these and other options for accepting and protecting data submission.

A Review of NACMPI's Recommendations on the Use of Industry Data
The National Advisory Committee on Meat and Poultry Inspection (NACMPI) was established to advise the Secretary of Agriculture on food safety policies affecting federal

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[1] Legislation that requires federal agencies to perform an internal risk assessment of their electronic information systems and security processes.
[2] *Management's Responsibility for Internal Control*. Provides guidance to Federal managers on improving the accountability and effectiveness of Federal programs and operations by establishing, assessing, correcting, and reporting on internal control.
[3] *Financial Management Systems*. Prescribes policies and standards for executive departments and agencies to follow in developing, operating, evaluating, and reporting on financial management systems.
[4]*Management of Federal Information Resources*. Establishes policy for the management of Federal information resources. OMB includes procedural and analytic guidelines for implementing specific aspects of these policies as appendices.

and state inspection systems. FSIS seeks the Committee's input on various issues regarding food safety.

Since 2003, FSIS has requested input by NACMPI on how to improve the quality of data used for agency actions. Three major areas FSIS and NACMPI have focused on are:
(1) How can FSIS best use data to support risk-based inspection?
(2) How can FSIS better associate its food safety activities with public health surveillance data?
(3) What data can FSIS acquire to better anticipate food borne hazards?

NACMPI responded that supplementing FSIS' data with data from interested stakeholders (states, academia, consumers, industry, federal agencies and foreign countries) could maximize the Agency's ability to safeguard meat, poultry, and egg products, and provided considerations for moving forward. General recommendations for use of third party data include consideration of data quality, data transfer, data sharing and FSIS' use of data for decision making.

Specifically, the Committee recommended that FSIS explore ways that industry, academia, consumers, and other stakeholders can transfer data to FSIS. Considerations include:
• Incentives for participation,
• Administration of a data depository,
• Responsiveness to FSIS data needs, and
• Data quality
  The Committee also recommended a pilot data sharing project that:
• Was non-threatening, and
• Addressed an issue of interest to FSIS and stakeholders such as the use of indicator bacteria to assess process control or the effectiveness of equipment disinfection protocols.

FSIS is increasing its focus on data quality and data needs. As part of this, it is revisiting NACMPI recommendations and would like further stakeholder input on those recommendations.

Current Thinking on How FSIS Can Best Use Third Party Data in the Development of RBI
FSIS intends to enhance its ability to measurably impact public health protection through safe meat, poultry, and processed egg products. Consequently, it is the intention of FSIS to more fully use non-FSIS data to supplement FSIS data in informing effective risk management strategies. The process by which these data are used will be as transparent to stakeholders as practical and feasible. FSIS has used non-FSIS data in a variety of ways in the past, such as through risk assessments and economic impact analyses, to develop regulations and for risk-based verification testing programs. Thus far, most of the data submitted and used by FSIS have been aggregate data, not specific to individual establishments. As FSIS develops risk-based inspection, validated aggregate data will

continue to be useful in assessing broad, nationwide risk management impacts. However, a primary focus of current risk-based activity relates to the degree of process control exhibited by individual establishments and then "crediting" that degree of control by allocating an appropriate level of inspection by FSIS in that establishment. Inspection, in this case, relates both to time and attention by FSIS inspection program personnel in verifying food safety through observation of the production process or by a review of records, and to the collection of meat, poultry, and processed egg product samples for laboratory analysis. Of concern to FSIS regarding reliance upon non-FSIS data is the fact that in previous instances when FSIS did not first validate non-FSIS data or verify to ensure on-going reliability, product recalls occurred.   Thus, in formulating how best to use non-FSIS data to inform how FSIS inspection resources should be allocated, mechanisms need to be identified and implemented that assure that these non-FSIS data are reliable and that they remain reliable over time. In today's discussion, FSIS will present real examples of both effective and ineffective use of non-FSIS data in order to generate discussion and solutions to better use of non-FSIS data.